

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MW GESTION, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

1GLOBE CAPITAL LLC, JIAQIANG LI,
CHIANG LI FAMILY, JEFF LI, and
LINDA LI

Defendants.

Case No.: 1:22-cv-11315-NMG

**JOINT STIPULATION OF
VOLUNTARY DISMISSAL PURSUANT
TO FED. R. CIV. P. 41(a)(1)(A)(ii)**

Lead Plaintiff MW Gestion (“Lead Plaintiff”), and Defendants 1Globe Capital LLC, Jiaqiang Li, Chiang Li Family, Jeff Li, and Linda Li (“Defendants”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate and agree as follows:

WHEREAS, on August 18, 2023, the Court entered a Memorandum & Order denying Defendants’ Motion to Dismiss as to Lead Plaintiff’s tortious interference with contract claim and granting Defendants’ motion to dismiss as to Lead Plaintiff’s federal securities law claims (the “MTD Order”) (ECF No. 43) on statute of limitation grounds, which rendered the dismissal of the federal securities law claims a dismissal with prejudice;

WHEREAS, on September 18, 2023, Defendants filed an Answer to the Amended Complaint (ECF No. 46);

WHEREAS, on March 19, 2025, Lead Plaintiff filed a Motion for Leave to File the Second Amended Class Action Complaint (the “Motion for Leave to Amend”), for which the parties completed briefing on April 2, 2025 (ECF Nos. 79-85);

WHEREAS, on April 23, 2025, the Court entered a Memorandum & Order denying Lead Plaintiff's Motion for Leave to Amend (ECF No. 86);

WHEREAS, the only claim remaining in this action is Lead Plaintiff's claim for tortious interference with contract that the Court sustained in the MTD Order;

WHEREAS, as Lead Plaintiff explained in its Motion for Leave to Amend, in light of a decision by the Judicial Committee of the Privy Council (the "Privy Council Decision") in a related matter ruling that the Rights Agreement at issue in this action is invalid, Lead Plaintiff does not intend to pursue its tortious interference with contract claim (ECF No. 80);

WHEREAS, Lead Plaintiff intends to appeal, and expressly preserves all appellate rights as to, the dismissal of the federal securities law claims that the Court dismissed in the MTD Order (ECF No. 43) and the Court's denial of Lead Plaintiff's Motion for Leave to Amend (ECF No. 86);

NOW, THEREFORE, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the Parties, by and through their counsel of record, hereby stipulate and agree, that:

1. Lead Plaintiff's tortious interference with contract claim (Count IV in the Amended Class Action Complaint, ECF No. 23) is hereby dismissed with prejudice, with the result that all claims in this action now have been dismissed with prejudice either by the Court (ECF No. 43) or by Lead Plaintiff.

2. Lead Plaintiff expressly preserves all appellate rights.

IT IS SO STIPULATED.

Dated: May 9, 2025

POMERANTZ LLP

/s/ Michael Grunfeld

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